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Attorney for Defendant

6 **UNITED STATES DISTRICT COURT**  
7 **DISTRICT OF NEVADA**  
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9 UNITED STATES OF AMERICA,

10 Plaintiff,

11 vs.

12 TAJ THOMPSON,

13 Defendant.

Case No. 2:16-cr-230-GMN-DJA

STIPULATION TO CONTINUE  
SENTENCING  
(Second Request)

14 IT IS HEREBY STIPULATED AND AGREED by and between the United States  
15 of America, through Robert Knief, Esq., Assistant United States Attorney, together with  
16 Daniel Hill, Esq., counsel for defendant Taj Thompson, that the sentencing hearing  
17 currently scheduled for July 16, 2020 at 10:00 a.m. be vacated and set to a date and time  
18 convenient to this Court, but no sooner than 60 days from the current sentencing date.

19 This stipulation is entered into for the following reasons:

- 20 1. The Defendant is out of custody and does not object to the continuance.  
21  
22 2. This is the second post-COVID stipulation.  
23  
24 3. Defense counsel needs additional time to prepare for Defendant's sentencing

1 because a lengthy sentencing memorandum is necessary.

2 4. The parties agree to the continuance.

3 5. Additionally, denial of this request for continuance could result in a  
4 miscarriage of justice.

5 6. On March 30, 2020 Chief Judge Du issued Temporary General Order 2020-05  
6 finding that in-person hearings could jeopardize health and safety. Hearings  
7 by video are permitted under certain circumstances, but only where it can be  
8 found that the hearing cannot be further delayed without serious harm to the  
9 interests of justice.

10 7. The parties agree there are no case-specific facts as to this matter where  
11 further delay would cause serious harm to the interests of justice. Therefore,  
12 a continuance of the sentencing is appropriate.

13 DATED this 6th day of July 2020.

14 /s/ *Daniel Hill*

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16 Daniel Hill, Esq.  
Counsel for Taj Thompson

17 /s/ *Robert Knief*

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19 Robert Knief, Esq.  
Counsel for the United States

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

2:16-cr-230-GMN-DJA

**Plaintiff,**

## ORDER

vs.

TAJ THOMPSON,

**Defendant.**

The ends of justice served by granting said continuance outweigh the best interest of the public and the defendant in a speedy sentencing, since the failure to grant said continuance would be likely to result in a miscarriage of justice, would deny the parties herein sufficient time and the opportunity within which to be able to effectively and thoroughly prepare for sentencing, taking into account the exercise of due diligence.

IT IS THEREFORE ORDERED that sentencing in the above-captioned matter currently scheduled for July 16, 2020 at 10:00 a.m., be vacated and continued to

September 23, 2020, at 11:00 a.m.

DATED July 8, 2020

THE HONORABLE GLORIA M. NAVARRO  
U.S. DISTRICT COURT JUDGE